Remarks

Entry of the amendments, reconsideration of the application, as amended, and allowance of all pending claims are respectfully requested. Claims 25-28 and 53-73 remain pending.

Applicants respectfully request that these amendments be entered. Applicants did not provide these amendments earlier, since applicants believed that these amendments were not needed. However, pursuant to a telephone conference with Examiner Sniezek on July 27, 2004, in which claim 25 was discussed, applicants now believe that these amendments would be helpful in clarifying the language of the rejected independent claims. These amendments are being offered to clarify the language "detecting one or more circumferential systematic timing errors, wherein a circumferential systematic timing error is an along-track error that varies with circumferential position." Support for the amendments can be found throughout the specification (e.g., p. 35, FIG. 16), as well as in the pending claims (e.g., claim 26), and thus, no new matter is being added.

Applicants gratefully acknowledge the time afforded applicants' attorney, Blanche E. Schiller, and inventor, Mark Schultz, by Examiner Sniezek during the telephonic interview on July 27, 2004, in which the rejected claims were discussed. During that telephonic interview, applicants discussed their understanding of the phraseology of claim 25 and the Examiner suggested that some clarification be provided. The Examiner indicated that if amendments were provided to clarify the language, and if the amendments would otherwise place the case in condition for allowance, that the amendments would be entered. No agreement as to language was reached.

During the telephonic interview, claim 72 was also discussed. No agreement was reached.

Applicants gratefully acknowledge the indication of allowability of claims 26-28 and 54-71.

In the Office Action, dated June 18, 2004, claims 25, 53, 72 and 73 are rejected under 35 U.S.C. 102(e) as being anticipated by Cribbs et al. Applicants respectfully, but most strenuously, traverse this rejection to any extent deemed applicable to the amended claims.

Applicants' invention is directed, in one aspect, to the detection and correction of errors in the writing of timing patterns on a storage medium. These errors are systematic (i.e., non-random) errors that vary with circumferential position (e.g., with sector number), while remaining relatively constant with respect to neighboring tracks. Further, these errors are timing errors, which are along-track errors in the writing of timing patterns, rather than across-track errors, which are non-timing errors. Thus, the errors addressed by applicants' recited detection and correction scheme are circumferential systematic timing errors.

As one example, applicants claim a method for correcting for systematic errors in the writing of timing patterns on a storage medium by a head of a recording device (e.g., independent claim 25). The method includes, for instance, detecting a plurality of systematic timing errors at a plurality of differing circumferential positions; using at least multiple systematic timing errors of said plurality of systematic timing errors to detect one or more circumferential systematic timing errors, wherein a circumferential systematic timing error is an along-track systematic error that varies with circumferential position; and correcting for said one or more circumferential systematic timing errors. Thus, in applicants' claimed invention, a plurality of systematic timing errors are detected and at least two of those systematic timing errors are used to determine a circumferential systematic timing error. That is, a circumferential systematic timing error is an along-track systematic error that varies with circumferential position. Thus, to detect such an error, at least two systematic timing errors at two different circumferential positions are to be detected. This is very different from the teachings of Cribbs.

Cribbs describes a technique for writing servotracks on a disk. In order to mark the beginning of each revolution of the disk, a gap is created in the clock track. After a track is written, the length of the gap is measured to ensure a proper gap (Col. 6). This measurement is taken at the location of the gap and there is only one gap for a given write. Since only one measurement is taken for a written track, there cannot be a determination of an along-track systematic error that varies with circumferential position, as claimed by applicants. In order to make such a determination, at least two timing errors at different circumferential positions are to be detected. By detecting at least two errors at different circumferential positions, a determination can be made that an along-track systematic error that varies with circumferential

position is present. Without multiple measurements at different circumferential positions, such a determination cannot be made.

Again, in Cribbs, only one measurement is taken at the location of the gap and only one measurement for a written track. There is no description, teaching or suggestion in Cribbs of taking one measurement at one circumferential position and then another measurement at another circumferential position to determine that an error exists that varies with circumferential position, as claimed by applicants. Thus, Cribbs does not describe, teach or suggest applicants' claimed invention.

Based on the foregoing, applicants respectfully submit that independent claim 25, as well as independent claim 53, are patentable over Cribbs. Further, the claims that depend from those independent claims are patentable for similar reasons, as well as for their own additional features. Thus, applicants respectfully request an indication of allowability for all pending claims.

Applicants urge the Examiner to contact applicants' attorney, should the Examiner have any concern with the amendment or arguments presented herein.

Respectfully submitted,

Blanche E. Schiller

Blanche E. Schiller
Attorney for Applicants
Registration No.: 35,670

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HESLIN ROTHENBERG FARLEY & MESITI P.C.
5 Columbia Circle
Albany, New York 12203-5160
Telephone: (518) 452-5600
Facsimile: (518) 452-5579